

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,)
Plaintiff,)
v.)
ERIN T. WITHTINGTON) Civil Action No. 04-cv-11948-RGS
and CITY OF BOSTON,)
Defendants.)

)

LOCAL RULE 16.1(D) JOINT STATEMENT

Agenda for Pretrial Conference

Approval of a Discovery Schedule and establishing deadlines.

Initial Disclosures

Mr. Hosseini-Sedehy intends to serve his initial disclosures pursuant to Fed.R.Civ. 26(a)1 before January 24, 2005. The Defendants will serve their initial disclosures by February 7, 2005.

Possibility of Prompt Settlement/Alternative Dispute Resolution

Mr. Hosseini-Sedehy is interested in prompt settlement of this matter and any reasonable alternative dispute resolution. The Defendants have not made a determination whether this case is appropriate for alternative dispute resolution at this time.

Proposed Discovery Plan

Deadline for Completion of Phase I Discovery: September 15, 2005.

Deadline for Completion of Phase II Discovery: November 15, 2005.

Disclosure of Expert Opinions: Plaintiff shall identify his experts and serve reports pursuant to Fed. R. Civ. P. 26 no later than December 15, 2005. Defendants shall identify their experts and serve reports pursuant to Fed. R. Civ. P. 26 no later than January 30, 2006. All expert depositions are to be completed on or before February 28, 2006.

Trial By Magistrate

Mr. Hosseini-Sedehy is willing to consent to a trial by magistrate if he is guaranteed a jury trial on his claims. The Defendants have not yet decided whether to consent to trial by magistrate.

Dispositive Motions

Dispositive motions shall be filed no later than March 30, 2006.

City of Boston and
Erin T. Withington

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Date: January 19, 2005